

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TONY KOLE, individually and as President) and Manager of Ghost Industries, LLC, and) GHOST INDUSTRIES, LLC, an Illinois) limited liability company,) Plaintiffs,) v.) Defendants.)	Civil Case No: 1:11-cv-03871 Hon. Charles R. Norgle, Sr. U.S. District Judge Hon. Morton Denlow U.S. Magistrate Judge
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PLAINTIFFS' RESPONSE TO DEFENDANTS'
MOTION TO DISMISS AMENDED COMPLAINT

NOW COME Plaintiffs, TONY KOLE and GHOST INDUSTRIES, LLC, by their attorney, Walter P. Maksym, Jr., and submit the following Response to Defendants' Motion to Dismiss Amended Complaint (Doc. 15) and Memorandum in Support (Doc. 15.1), and state:

1. Plaintiffs admit that they have filed an eighteen-count Amended Complaint. However, Defendants mischaracterizes it as merely challenges their "licensing and regulation of Plaintiffs' weapons sales business within the Village of Norridge" is oversimplified, as will be discussed in Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Dismiss Amended

Complaint filed herewith.

WHEREFORE Plaintiffs respectfully pray that, for the reasons set forth in Plaintiffs' Memorandum, this Court should enter an order find that the Amended Complaint states claims upon which relief could be granted, deny Defendants' Motion to Dismiss it, and grant such other further relief as may be fair, just and proper in the premises.

Respectfully submitted,

TONY KOLE and GHOST INDUSTRIES, LLC, Plaintiffs,

By /s/ Walter P. Maksym, Jr.

Walter P. Maksym, Jr., their attorney

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